

SUPPORT DOCUMENT - 2/2001
(Lvfsup8.DOC)

for the Air Operating Permit No. WA 000007-8 issued to

Longview Fibre Company
P.O. Box 639
Longview, WA. 98632

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600

TABLE OF CONTENTS

INTRODUCTION.....	4
STATEMENT OF BASIS.....	4
I. Assuring Compliance With All Applicable Federal	
Requirements.....	4
A1. Recovery furnace 15 - federally enforceable	
limits	5
A2. Recovery furnace 18 - federally enforceable	
limits	6
A3. Recovery furnace 19 - federally enforceable	
limits	6
A4. Recovery furnace 22 - federally enforceable	
limits	7
B1. Smelt Dissolving Tanks 15 - federally enforceable	
limits	7
B2. Smelt Dissolving Tanks 18 - federally enforceable	
limits	8
B3. Smelt Dissolving Tanks 19 - federally enforceable	
limits	8
B4. Smelt Dissolving Tank 22 - federally enforceable	
limits	9
C1. Lime Kiln 1 - federally enforceable limits.....	9
C2. Lime Kiln 2 - federally enforceable limits.....	10
C3. Lime Kiln 3 - federally enforceable limits.....	10
C4. Lime Kiln 4 - federally enforceable limits.....	10
C5. Lime Kiln 5 - federally enforceable limits.....	11
D1. Power Boiler 12 - federally enforceable limits.....	11
D2. Power Boiler 13 - federally enforceable limits.....	11
D3. Power Boiler 16 - federally enforceable limits.....	12
D4. Power Boiler 17 - federally enforceable limits.....	12
D5. Power Boiler 20 - federally enforceable limits.....	13
E1. Cogen 23 - federally enforceable limits.....	13
F1. Neutral Sulfite Semi-Chemical Plant (NSSC) -	
federally enforceable limits	14

F2.	NSSC Sulfur Burner (SCMS) - federally enforceable limits	14
G1.	Digesters, Multiple-effect Evaporators, Brownstock Washers, and Condensate Stripper Systems - federally enforceable limits	14
G2.	Paper Machine 10 - federally enforceable limits.....	14
H1.	Millwide Limits - federally enforceable limits.....	14
	Facility-Wide General Requirement Condition 8.....	14
	Facility-Wide General Requirement Condition 10.....	15
	Facility-Wide General Requirement Condition 11.....	15
II.	Insignificant Emission Units	16
III.	Regulatory Orders	16
APPENDIX A - RESPONSE TO COMMENTS.....		16

INTRODUCTION

This Operating Permit Support Document fulfills the operating permit rule "Statement of Basis" requirement and explains particular portions of the air operating permit for the Longview Fibre Company.

This document is not part of the operating permit for Longview Fibre Company. Nothing in this document is enforceable against the permittee, unless otherwise made enforceable by permit or order.

STATEMENT OF BASIS

When the Department of Ecology issues a draft operating permit, it is required to provide a statement that sets forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions. [WAC 173-401-700(8)]

I. Assuring Compliance With All Applicable Federal Requirements

Certain permit conditions impose more than one emission limit or requirement that is based on two or more underlying applicable requirements. The permit lists the most stringent of multiple requirements first, then the additional limits, into single permit condition. When several requirements impose the same limit, all applicable requirements are listed with the limit.

Copies of the state Regulatory Orders and Prevention of Significant Deterioration (PSD) Permits that impose limitations and requirements on the permittee are included in Appendix D of the permit. The Orders/Permits establish source-specific limitations. The Orders/Permits are not intended to be a separate legal source for default limitations that are based in state and federal regulations.

Ecology has preferentially relied on direct measure as the most robust and accurate method of determining compliance. Cases in which direct measure is difficult or impossible, such as opacity measurement of wet stacks, necessitate use of an indirect surrogate parameter. Where surrogate monitoring parameters are employed, noncompliance with the surrogate limitation requires corrective action. Failure to take corrective action and bring the surrogate parameter within bounds constitutes noncompliance with the need to follow good operation and maintenance as required by WAC 173-405-040(10) and possible noncompliance with the underlying requirement.

Source test frequency, continuous emissions monitoring, or surrogate parameter monitoring are generally stipulated through Orders/Permits. Limits for which monitoring is not specified in the Orders/Permits are assigned monitoring requirements as part of the air operating permit. The frequency source testing and assignment of surrogate parameters is based on best professional judgment using historical performance relative to the imposed limitation and the potential magnitude of an exceedence. The monitoring program is intended to meet the Title V requirement of monitoring sufficient to assure compliance.

The following discussion includes test methods used to demonstrate compliance with permit limits. The test methods used are defined below:

RM 5 For NSPS sources including Recovery Furnace No. 22, Smelt Dissolving Tank No. 22, Lime Kiln No. 5, and Power boiler No. 20; Reference Method 5 of 40 CFR, Part 60, Appendix A, or an alternative approved by Ecology, under the assumption that all of the particulate collected is PM₁₀.

For all other sources; Reference Method 5 of 40 CFR, Part 60, Appendix A, or Ecology Method 5 as found in the 'Source Test Manual - Procedures for Compliance Testing', 1983, or an alternative approved by Ecology, under the assumption that all of the particulate collected is PM₁₀.

RM 6c Reference Method 6c of 40 CFR, Part 60, Appendix A, or an alternative approved by Ecology. For SO₂ source tests conducted on a stack with a continuous TRS monitor, the test may be conducted using LVF Source Test Method 201, a modification of Method 6c which uses the TRS monitor in an SO₂ monitoring mode (see Appendix A).

RM 9 Reference Method 9 of 40 CFR, Part 60, Appendix A; or Ecology Method 9B as found in the 'Source Test Manual - Procedures for Compliance Testing', 1983, or an alternative approved by Ecology.

RM 16 Reference Method 16 of 40 CFR, Part 60, Appendix A, and measured as H₂S, or an alternative approved by Ecology. LVF Source Test Method 202, which captures gas in a Tedlar bag for analysis, may be used to test smelt dissolving tank TRS emissions (see Appendix A).

RM 25A Reference Method 25A of 40 CFR, Part 60, Appendix A, and measured as C, or an alternative approved by Ecology.

A1. Recovery furnace 15 - federally enforceable limits

Particulate matter (PM) and particulate matter less than ten microns in aerodynamic diameter (PM₁₀) limit compliance is monitored quarterly with a source test using RM 5 (A1.1). Opacity was added to the additional data collected with source tests to correct an oversight in Order No. DE 00AQIS-704 (A1F.1).

Opacity is continuously monitored with a CEM following an electrostatic precipitator (A1.2). Additional treatment is provided by as scrubber. Minimum scrubber flow rate is specified and the scrubber flow rate is continuously monitored. Additionally, visual tests using RM 9 can be run.

Sulfur dioxide (SO₂) limit compliance is monitored quarterly with a source test using RM 6C (A1.3).

Total reduced sulfides (TRS) limit compliance is continuously monitored with a CEM (A1.4).

Carbon monoxide (CO) limit compliance is calculated using the method specified the permit (A1.5). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

Nitrogen oxides (NOx) limit compliance is calculated using the method specified the permit (A1.6). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

A2. Recovery furnace 18 - federally enforceable limits

PM & PM10 limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (A2.1). Opacity was added to the additional data collected with source tests to correct an oversight in Order No. DE 00AQIS-704 (A1F.1).

Opacity limit is continuously monitored with a CEM (A2.2). Additionally, visual tests using RM 9 can be run.

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (A2.3).

TRS limit compliance is continuously monitored with a CEM (A2.4).

CO limit compliance is calculated using the method specified in the permit (A2.5). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

NOx limit compliance is calculated using the method specified in the permit (A2.6). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

A3. Recovery furnace 19 - federally enforceable limits

PM & PM10 limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (A3.1). Opacity was added to the additional data collected with source tests to correct an oversight in Order No. DE 00AQIS-704 (A1F.1).

Opacity limit is continuously monitored with a CEM (A3.2).
Additionally, visual tests using RM 9 can be run.

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (A3.3).

TRS limit compliance is continuously monitored with a CEM (A3.4).

CO limit compliance is calculated using the method specified in the permit (A3.5). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

NOx limit compliance is calculated using the method specified in the permit (A3.6). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

A4. Recovery furnace 22 - federally enforceable limits

This unit must meet the requirements of 40 CFR Part 60 Subpart BB and the general requirements of 40 CFR Part 60.

PM & PM₁₀ limit compliance is monitored quarterly with a source test using RM 5 (A4.1). Opacity was added to the additional data collected with source tests to correct an oversight in Order No. DE 00AQIS-704 (A1F.1).

Opacity limit is continuously monitored with a CEM (A4.2).
Additionally, visual tests using RM 9 can be run.

SO₂ limit is continuously monitored with a CEM (A4.3).

TRS limit compliance is continuously monitored with a CEM (A4.4).

CO limit compliance is continuously monitored with a CEM (A4.5).

NOx limit compliance is continuously monitored with a CEM (A4.6).

B1. Smelt Dissolving Tanks 15 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (B1.1).

Opacity limit compliance is monitored by monitoring water flow, fan status, tank draft, and explosion dampers as performance indicator parameters. Additionally, visual tests using RM 9 can be run (B1.2).

SO₂ limit compliance is monitored one time per three years with a source test using RM 6C. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B1.3).

TRS limit compliance is monitored one time per three years with a source test using RM 16. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B1.4).

B2. Smelt Dissolving Tanks 18 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (B2.1).

Opacity limit compliance is monitored by monitoring water flow, fan status, tank draft, and explosion dampers as performance indicator parameters. Additionally, visual tests using RM 9 can be run (B2.2).

SO₂ limit compliance is monitored one time per three years with a source test using RM 6C. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B2.3).

TRS limit compliance is monitored one time per three years with a source test using RM 16. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B2.4).

B3. Smelt Dissolving Tanks 19 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (B3.1).

Opacity limit compliance is monitored by monitoring water flow, fan status, tank draft, and explosion dampers as performance indicator parameters. Additionally, visual tests using RM 9 can be run (B3.2).

SO₂ limit compliance is monitored one time per three years with a source test using RM 6C. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B3.3).

TRS limit compliance is monitored one time per three years with a source test using RM 16. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B3.4).

B4. Smelt Dissolving Tank 22 - federally enforceable limits

This unit must meet the requirements of 40 CFR Part 60 Subpart BB and the general requirements of 40 CFR Part 60.

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (B4.1).

Opacity limit compliance is monitored by monitoring water flow, fan status, tank draft, and explosion dampers as performance indicator parameters. Additionally, visual tests using RM 9 can be run (B4.2).

SO₂ limit compliance is monitored one time per three years with a source test using RM 6C. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B4.3).

TRS limit compliance is monitored one time per three years with a source test using RM 16. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (B4.4).

C1. Lime Kiln 1 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C1.1).

Opacity limit compliance is monitored by monitoring scrubber water flow as a performance indicator parameter. Additionally, visual tests using RM 9 can be run (C1.2).

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C1.3).

TRS limit compliance is continuously monitored with a CEM (C1.4).

C2. Lime Kiln 2 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C2.1).

Opacity limit compliance is monitored by monitoring scrubber water flow as a performance indicator parameter. Additionally, visual tests using RM 9 can be run (C2.2).

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C2.3).

TRS limit compliance is continuously monitored with a CEM (C2.4).

C3. Lime Kiln 3 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C3.1).

Opacity limit compliance is monitored by monitoring scrubber water flow as a performance indicator parameter. Additionally, visual tests using RM 9 can be run (C3.2).

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C3.3).

TRS limit compliance is continuously monitored with a CEM (C3.4).

C4. Lime Kiln 4 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less

frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C4.1).

Opacity limit compliance is monitored by monitoring scrubber water flow as a performance indicator parameter. Additionally, visual tests using RM 9 can be run (C4.2).

SO₂ limit compliance is monitored monthly with a source test using RM 6C. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (C4.3).

TRS limit compliance is continuously monitored with a CEM (C4.4).

C5. Lime Kiln 5 - federally enforceable limits

This unit must meet the requirements of 40 CFR Part 60 Subpart BB and the general requirements of 40 CFR Part 60.

PM & PM₁₀ limit compliance is monitored quarterly with a source test using RM 5 (C5.1).

Opacity limit is continuously monitored with a CEM. Additionally, visual tests using RM 9 can be run (C5.2).

SO₂ limit compliance is monitored quarterly with a source test using RM 6C (C5.3).

TRS limit compliance is continuously monitored with a CEM (C5.4).

CO limit compliance is continuously monitored with a CEM (C5.5).

NO_x limit compliance is calculated using the method specified in the permit (C5.6). The formula included in the air operating permit includes a factor of "million/10⁶" which corrects an oversight in PSD-X81-10A.

D1. Power Boiler 12 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored quarterly with a source test using RM 5 (D1.1).

Opacity limit compliance is monitored by monitoring scrubber water flow and backpressure as performance indicator parameters. Additionally, visual tests using RM 9 can be run (D1.2).

SO₂ limit compliance is calculated using the method specified in the permit (D1.3).

D2. Power Boiler 13 - federally enforceable limits

PM & PM₁₀ limit compliance is monitored quarterly with a source test using RM 5 (D2.1).

Opacity limit compliance is monitored by monitoring scrubber water flow and backpressure as performance indicator parameters. Additionally, visual tests using RM 9 can be run (D2.2).

SO₂ limit compliance is calculated using the method specified in the permit (D2.3).

D3. Power Boiler 16 - federally enforceable limits

PM & PM₁₀ limit compliance was not previously monitored. Quarterly source tests using RM 5 is required as part of the air operating permit (D3.1). The date for compliance with the PM & PM₁₀ monitoring requirement is no later than the October-December quarter of 2003. The compliance date corresponds to a project which includes replacement of the stack. The present stack is not properly equipped for the required testing. In the interim, opacity will be used as a surrogate to demonstrate compliance with the limit. Periods with an average opacity greater than 20% for more than 60 consecutive minutes will be reported as PM & PM₁₀ violations.

Opacity limit is continuously monitored with a CEM. Additionally, visual tests using RM 9 can be run (D3.2).

SO₂ limit compliance is calculated using the method specified in the permit (D3.3). To correct oversights in Order No. DE 00AQIS-704:
a factor of "10⁶/million" was added to the formula included in the air operating permit to calculate ppm_{dv} SO₂ @ 7% O₂, and
a requirement to report results in ppm was included and the requirement to report results in tons/D was deleted.

D4. Power Boiler 17 - federally enforceable limits

PM & PM₁₀ limit compliance was not previously monitored. Quarterly source tests using RM 5 is required as part of the air operating permit (D4.1). The date for compliance with the PM & PM₁₀ monitoring requirement is no later than the October-December quarter of 2003. The compliance date corresponds to a project which includes replacement of the stack. The present stack is not properly equipped for the required testing. In the interim, opacity will be used as a surrogate to demonstrate compliance with the limit. Periods with an average opacity greater than 20% for more than 60 consecutive minutes will be reported as PM & PM₁₀ violations.

Opacity limit is continuously monitored with a CEM. Additionally, visual tests using RM 9 can be run (D4.2).

SO₂ limit compliance is calculated using the method specified in the permit (D4.3). To correct oversights in Order No. DE 00AQIS-704:
a factor of "10⁶/million" was added to the formula included in the air operating permit to calculate ppm_{dv} SO₂ @ 7% O₂, and
a requirement to report results in ppm was included and the requirement to report results in tons/D was deleted.

D5. Power Boiler 20 - federally enforceable limits

This unit must meet the requirements of 40 CFR Part 60 Subpart D and the general requirements of 40 CFR Part 60.

PM & PM10 limit compliance is monitored monthly with a source test using RM 5. Provision for frequency reduction to quarterly is made if emissions are <75% of the limit for six consecutive months. Less frequent source testing is allowed only as long as source tests continue to demonstrate emissions are <75% of the limit (D5.1).

Opacity limit compliance is monitored by monitoring scrubber water flow and backpressure as performance indicator parameters. Additionally, visual tests using RM 9 can be run (D5.2). The alternative opacity monitoring requirement has not yet been approved by EPA. Should the monitoring requirements approved by EPA differ from those in the permit, the permit will be opened and the condition will be revised to reflect the EPA approved alternative opacity monitoring requirements.

SO₂ limit is continuously monitored with a CEM (D5.3).

NOx limit compliance is continuously monitored with a CEM (D5.4).

E1. Cogen 23 - federally enforceable limits

This unit must meet the requirements of 40 CFR Part 60 Subpart GG and the general requirements of 40 CFR Part 60.

PM & PM10 limit compliance is monitored one time per three years with a source test using RM 5. Monitoring frequency of one test per three years is based on proven compliance at the source. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (E1.1).

Opacity limit compliance is demonstrated by burning only natural gas. Additionally, visual tests using RM 9 can be run (E1.2).

SO₂ limit compliance is assured by burning only natural gas which is ~0.0008% sulfur by weight (E1.3).

CO limit compliance is continuously monitored with a CEM (E1.4).

NOx limit compliance is continuously monitored with a CEM (E1.5).

NH₃ limit compliance is calculated with data collected from inlet and outlet NOx CEMs (E1.6).

VOC limit compliance is monitored one time per three years with a source test using RM 25A. Monitoring frequency of one test per three years is based on proven compliance at the source during the initial performance test. During the first five years after issuance of Order DE 00AQIS-704, a VOC source test shall be conducted along with each

RATA test conducted on the unit. If the limit is exceeded, monthly source testing is required. After 6 months of demonstrating compliance with the limit, LVF may request reconsideration of decreased testing frequency (E1.7).

F1. Neutral Sulfite Semi-Chemical Plant (NSSC) - federally enforceable limits

VOC limit compliance is calculated using the method specified in the permit (F1.4).

F2. NSSC Sulfur Burner (SCMS) - federally enforceable limits

The sulfur burner and lime kiln 3 share a common stack. Compliance with regulatory requirements applicable to the sulfur burner (PM - condition F2.1, Opacity - condition F2.2, and SO₂ - condition F2.3) is monitored by monitoring the lime kiln 3 stack (unit C3.).

G1. Digesters, Multiple-effect Evaporators, Brownstock Washers, and Condensate Stripper Systems - federally enforceable limits

Kamyr Digester and Washer No. 1; Kamyr Digester and Washer No. 2; and Multiple-effect Evaporator Set 10 must meet the requirements of 40 CFR Part 60 Subpart BB and the general requirements of 40 CFR Part 60. The TRS limit for these units is monitored by monitoring unit operation, flame safety interlocks, and interlock connections to NCG valves at the units burning noncondensable gasses (NCGs) (G1.1b). Units burning NCGs include lime kilns 1, 2, 3, and 4; and power boilers 12 and 13.

TRS emissions from units not covered by NSPS are not federally enforceable because the applicable portions of the state regulations are not part of the federally approved SIP (G1.3).

G2. Paper Machine 10 - federally enforceable limits

Requirements specific to paper machine 10 improvements were set forth in a NOC Order and are included in the air operating permit. Monitoring and reporting are required upon completion of the improvements (G2.1-3). Longview Fibre has applied for a PSD permit, which when issued will likely supersede the NOC Order requirements.

H1. Millwide Limits - federally enforceable limits

Millwide limits compliance is demonstrated by calculations for annual emissions, on a calendar year basis, as required in the permit (H.1 - H.6). Data for calculations comes from continuous monitoring, source tests, production rates, and emission factors. Parameters with millwide limits include PM & PM₁₀, SO₂, TRS, CO, NO_x, and VOC.

Facility-Wide General Requirement Condition 8

Permit Condition 8 is the generic opacity limitation from WAC 173-405-040(6) which addresses kraft mills. Permit Conditions 9 and 12 work together to assure compliance with Condition 8 by requiring, first, that facility equipment be maintained and operated "in a manner consistent with good air pollution control practice" and, second, that the permittee record and promptly respond to complaints received or possible noncompliance noticed by facility staff. Ecology believes that this is a practical and effective way to assure compliance because the emission units covered by this condition do not have control devices that can be monitored and they have very low risk of producing visible emissions except during process upsets. The mill is staffed around the clock and all staff are trained to notice and report unusual conditions, such as those associated with upsets. It is a violation of the permit to fail to take corrective action when an instance of possible noncompliance has been reported and found to be valid. Ecology believes that imposing additional monitoring such as a weekly visual inspection would have little value in identifying noncompliance and would, by presence, possibly convey a false sense of compliance.

Facility-Wide General Requirement Condition 10

Permit Condition 10 is the generic SO₂ limitation from WAC 173-405-040(11) which addresses kraft mills. SO₂ emissions are a concern from combustion sources. At Longview Fibre, combustion sources include power boilers 12, 13, 16, 17, & 20; cogen 23; recovery furnaces 15, 18, 19, & 22; and lime kilns 1, 2, 3, 4, & 5. SO₂ emissions from each of these units are addressed in the appropriate subsection for each individual unit. Ecology has not imposed monitoring for units unlikely to have a reasonable potential of exceeding SO₂ emission limits.

Surrogate monitoring for intervals between direct SO₂ testing was not imposed because in practice mills do not adjust operating parameters to minimize SO₂ emissions. There are no control devices or control strategies to allow this. Instead, SO₂ emissions are largely a function of equipment and process design. The nature of the kraft process is optimized by system stability and continuity. Ecology has no professional basis to believe that process parameters fluctuate to a degree that results in SO₂ emissions approaching the 1000 ppm limit and thus warranting surrogate monitoring.

Facility-Wide General Requirement Condition 11

Permit condition 11 consists of two parts. The first part is an inclusion of WAC 173-400-105(5)(h) which allows that monitoring and reporting requirements may be temporarily lifted during periods of monitoring system malfunction provided the permittee adequately explain such periods.

The second part of condition 11 is based on what Ecology considers an unlikely but possible scenario where recorded monitoring data is simply lost. Ecology will allow a 90% recovery rate for monitoring

data if the permittee provides an adequate explanation for the cause of the lost data. Ecology expects the permittee to make every reasonable effort to maintain the integrity of all monitoring results. An allowance is specified for missing monitoring results under certain conditions so that these defined conditions are not defined as "violations," thus reducing the administrative burden on the source and the permitting authority.

II. Insignificant Emission Units

The facility-wide general requirements apply to the whole facility, including insignificant emission units and activities (IEUs), as required by the operating permit rule. The rule states, however, that IEUs are not subject to monitoring requirements unless the generally applicable requirements in the State Implementation Plan (SIP) impose them. [WAC 173-401-530(2)(c)]. The Washington SIP does not impose any specific monitoring-related requirements for the facility-wide requirements for IEUs at this source. The permit, therefore, does not require any testing, monitoring, reporting, or recordkeeping for insignificant emission units or activities.

III. Regulatory Orders

The permittee is currently subject several regulatory orders. Copies of the orders are provided in Appendix D of the Title 5 permit.

An important issue regarding any Title V permit is the basis of authority for the applicable requirements. This is particularly true regarding monitoring and reporting requirements. The basis of authority is used to determine federal or state-only applicability. Many of the applicable requirements come from orders issued by Ecology. With the permittee's agreement the issue of state-only or federal applicability was put aside as it was agreed to rely entirely on WAC 173-401-615 as the basis of authority for the type and frequency of monitoring. WAC 173-401-615 requires monitoring and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. This regulation is federally enforceable. Monitoring and recordkeeping requirements based on this regulation are federally enforceable.

APPENDIX A - RESPONSE TO COMMENTS

The only comments came from the Longview Fibre Company (LVF). LVF made two comments.

Comment 1: The alternate CO emission limits specified in footnote E1F.3 for periods of cogen startup should also apply to cogen shutdown.

Response: The request was determined reasonable and within the scope of WAC 173-400-081. Order No. DE 01AQIS-2038 was issued making the requested change. Terms of Order No. DE 01AQIS-2038 were placed in Footnote E1F.3.

Comment 2: Opacity requirements in some other air operating permits contain the following condition:

If the total number of contiguous periods of excess emissions in a quarter is less than six percent of the total number of operating hours (excluding startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement.

The condition should be added to appropriate portions of the LVF permit.

Response: The opacity condition and a related TRS condition were found to be applicable to NSPS recovery furnaces. Recovery furnace #22 is a NSPS recovery furnace. A portion of the applicable requirements from 40 CFR Part 60 for the opacity limit (Permit Condition A4.2) and the TRS limit (Permit Condition A4.4) were omitted from the draft permit. The omitted sections (40 CFR 60.284(e)(1)(i)&(ii)) allow a certain percentage of time in excess of the limit to occur without being considered a violation. The changes were made to the appropriate monitoring and reporting portions of conditions A4.2 and A4.4.

A third change was made as a result of additional permit review. The portion of Power Boiler #20 condition D5.4 citing Order No. DE 00AQIS-704 as the applicable requirement was incomplete. The omitted portion of the limit, which specifies the NO_x emission limit when the boiler is fired only by gas, was added.